

Behrooz P. Vida, SBOT No. 20578040  
3000 Central Drive  
Bedford, Texas 76021  
Tel: (817) 358-9977  
Fax: (817) 358-9988  
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE: §  
ANDRE WILLIAMS §  
TAMMY RENEE WILLIAMS § BANKRUPTCY NO: 20-40200-ELM  
Debtor(s) §

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**TRUSTEE'S OBJECTION TO EXEMPTIONS**

**NO HEARING WILL BE CONDUCTED ON THIS PLEADING UNLESS A WRITTEN RESPONSE OR OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-FOUR (24) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, BEHROOZ P. VIDA, the Chapter 7 Trustee ("Trustee") of the above referenced bankruptcy estate and files this Trustee's Objection to Exemptions of Property (the "Objection") and, in support of the same, would show the Court as follows:

1. The objection is brought pursuant to 11 U.S.C. §522 and Bankruptcy Rule 4003(b).
2. This Court has jurisdiction of this matter under 28 U.S.C. § 1334(a) and 28 U.S.C.

§157(a), and this is a core proceeding pursuant to 28 U.S.C. §157(b)(1) and (b)(2)(B).

**Background**

3. This bankruptcy case (the “Bankruptcy Case”) was filed as a Chapter 7 on January 15, 2020 (the “Petition Date”) by ANDRE WILLIAMS and TAMMY RNEE WILLIAMS (the “Debtors”).
4. On May 1, 2020, Debtors amended their exemptions claim. [ECF No. 26].
5. Trustee objects to Debtors’ claims of exemptions as follows:
  - a. Trustee objects to Debtors pooling their 11 U.S.C. § 522(d)(5) exemptions for the purpose of exempting \$7,000.00 from the potential proceeds of the Estate of Eugene Williams. Mrs. Williams is not an heir and no portion of her (d)(5) exemption may be used towards exempting any proceeds from the estate of Eugene Williams.
  - b. Trustee objects to Debtors attempting to remove their business as an asset of the bankruptcy estate by claiming it as exempt.

WHEREFORE, PREMISES CONSIDERED, Trustee respectfully requests that this Court sustain the Objection and grant Trustee other and further relief which may be appropriate.

Respectfully submitted:

By: /s/ Behrooz P. Vida May 26, 2020  
Behrooz P. Vida  
State Bar No. 20578040  
3000 Central Drive  
Bedford, Texas 76021  
TEL: (817) 358-9977  
FAX: (817) 358-9988

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and forgoing instrument was served on the date that the instrument was filed electronically. Service was accomplished electronically and/or by first class mail to the parties indicated below:

Marcus Leinart  
Leinart Law Firm  
11520 N. Central Expressway, Suite 212  
Dallas, TX 75243

/s/ Behrooz P. Vida May 26, 2020  
Behrooz P. Vida